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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAVE E. CHAPPELL
Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,
Defendant.

Case No. 2:16-cv-01940-APG-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm, due on December 19, 2016 by 30 days, through and including January 18, 2016.

An extension of time is needed in order to prepare Defendant’s Cross-Motion to Affirm because the undersigned attorney has only recently been cleared as a Special Assistant United States Attorney, and supervisory attorneys must review the Commissioner’s brief prior to filing. The undersigned currently has 25 pending District Court and Circuit Court cases that are in various stages of litigation, handles

1 employment and privacy matters for the agency, and is scheduled to be on vacation from December 19,
2 2016 through December 27, 2016. Counsel assigned to review the Commissioner's brief currently has 45
3 District and Circuit Court cases that are in various stages of litigation, three of which require imminent
4 briefing, and additionally handles bankruptcy and other litigation matters for the agency. This request is
5 made in good faith with no intention to unduly delay the proceedings.

6 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
7 on December 7, 2016.

8 Respectfully submitted this 9th day of December, 2016.

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ C. Hay-Mie Cho
12 C. HAY-MIE CHO
13 Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX

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18 IT IS SO ORDERED:

19 
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 1-10-2017
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CERTIFICATE OF SERVICE

I, **C. Hay-Mie Cho**, certify that the following individuals were served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

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Dated this 9th day of December, 2016.

/s/ C. Hay-Mie Cho
C. HAY-MIE CHO
Special Assistant United States Attorney